



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF THE ATTORNEY GENERAL

200 PORTLAND STREET  
BOSTON, MASSACHUSETTS 02114

TOM REILLY  
ATTORNEY GENERAL

(617) 727-2200  
<http://www.ago.state.ma.us>

January 21, 2004

Sent via e-mail, hand-delivery, and/or U.S. Mail

Mary L. Cottrell, Secretary  
Massachusetts Department of Telecommunications and Energy  
One South Station, 2nd Floor  
Boston, MA 02110

Re: UNE Triennial Review Regarding Switching for Mass Market Customers,  
D.T.E. 03-60

Dear Secretary Cottrell:

Enclosed for filing please find the Attorney General's Third Set of Document and Information Requests to Verizon, AG-VZ-3-1 to 3-3, together with a Certificate of Service. We request that responses to the questions be provided in an electronic Excel spreadsheet file format as well as in paper format where data tables are requested.

Sincerely,

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Karlen J. Reed  
Assistant Attorney General  
Utilities Division  
200 Portland Street, 4th Floor  
Boston, MA 02114  
(617) 727-2200 ext. 3436

KJR/kr

Enc.

cc: Paula Foley, Hearing Officer/AGC (w/enc.).  
D.T.E. 03-60 Service List (w/enc.)

Proceeding by the Department of Telecommunications and Energy on its  
own Motion to Implement the Requirements of the Federal  
Communications Commission's Triennial Review Order Regarding  
Switching for Mass Market Customers.

## INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Verizon New England d/b/a Verizon Massachusetts ("Verizon MA" or "Company") or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.

7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.
13. If you refuse to respond to any Document and Information Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide two copies of each response to the Attorney General.
16. Unless the Request specifically provides otherwise, the term "Company" refers to Verizon MA's intrastate operations and includes all witnesses, representatives, employees, and legal counsel.

17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.
18. Please provide all responses to requests by February 2, 2004 as per the Hearing Officer's Ground Rules of October 17, 2003.

**THE COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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| Proceeding by the Department of Telecommunications and Energy on its | ) |              |
| own Motion to Implement the Requirements of the Federal              | ) |              |
| Communications Commission's Triennial Review Order Regarding         | ) | D.T.E. 03-60 |
| Switching for Mass Market Customers.                                 | ) |              |
|  | ) |              |

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**ATTORNEY GENERAL'S  
THIRD SET OF DOCUMENT AND INFORMATION REQUESTS  
TO VERIZON MASSACHUSETTS**

**AG-VZ-3-1** Does Attachment 1, Part 2 of the Supplemental Panel Testimony of John Conroy and John White contain all of the Common Language Location Identifier (CLLI) codes that Verizon considers to be competitive? If not, please provide the following data in table format for each MSA in Attachment 1, Part 2 of the Supplemental Panel Testimony of John Conroy and John White.

- A. A list of all of the CLLIs that Verizon considers competitive separated by density zone.
- B. The total number of voice grade equivalent lines served by CLECs associated with each CLLI.

Please supply the data in an Excel spreadsheet file as well as in a paper version.

**AG-VZ-3-2** Please provide the following data:

- A. The total number of Verizon CLLIs in MA.
- B. The number of CLLIs that are either in Zone 4, Pittsfield MSA, Barnstable MSA, or that have no MSA assignment (do not double count any CLLIs).
- C. The number of CLLIs included in Attachment 1, Part 2 of the Supplemental Panel Testimony of John Conroy and John White.
- D. The amount and an explanation of the difference between items 1 and 2 below:
  - 1. The count in item A less the count in item B;
  - 2. The count in item C

**AG-VZ-3-3** Please refer to the Verizon response to AG-VZ 1-2 (VZ#60), the column heading entitled “New MSA.”

- A. Has Verizon performed any analyses similar to that provided in Attachment 1, Parts 1 and 2 of the Supplemental Panel Testimony of John Conroy and John White using different MSA definitions? If so, please provide the analyses in both Excel worksheet format and paper format.
- B. Did Verizon perform any analyses similar to that provided in Attachment 1 of the Supplemental Panel Testimony of John Conroy and John White using the New England City and Town Area (NEC&TA) Division section of the MSA definitions published in June 2003? See OMB Bulletin No. 03-04 dated June 6, 2003, List 6; <http://www.whitehouse.gov/omb/bulletins/b03-04.html>. If so, please provide the analyses in both Excel worksheet format and paper format.
- C. Did Verizon perform analyses similar to that provided in Attachment 1 of the Supplemental Panel Testimony of John Conroy and John White using MSA definitions published earlier than 2003? If so, please provide each analysis in both Excel worksheet format and paper format. Please clearly indicate the sources and dates of the alternative MSA definitions.
- D. Please provide Verizon’s rationale for choosing the 2003 version of MSA definitions rather than the definitions used for the FCC Wireless Local Number Portability (LNP) proceeding (FCC 03-237, Order released 10/7/03, <http://wireless.fcc.gov/wlnp/documents/top100.pdf>).
- E. What source (specifically, which OMB list) did Verizon utilize for their MSA definitions?
- F. Please provide Verizon’s rationale for choosing the list in Part E above over List 6 from the same OMB Bulletin (03-04)?

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